



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

February 27, 2004

**MEMORANDUM**

**SUBJECT:** Wood Preservatives Containing Arsenic and/or Chromium: Risk Assessment and Science Support Branch's Revised Preliminary Risk Assessments and Science Chapters In Support of The Reregistration Eligibility Decision

**FROM:** Norm Cook, Chief *[Signature]* 2/27/04  
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**TO:** Connie Welch, Chief  
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**Introduction**

With this cover memo, the Risk Assessment and Science Support Branch (RASSB) is forwarding Preliminary Risk Assessments (PRAs) for human and environmental risks with Science Chapters in support of the Antimicrobials Division's (AD's) Reregistration Eligibility Decision (RED) for wood preservatives containing arsenic and/or chromium. The focus of these documents is Chromated Copper Arsenate (CCA), but Ammoniacal Copper Zinc Arsenate (ACZA) and Ammoniacal Copper Arsenate (ACA) are also covered by these drafts.<sup>1</sup>

Relative to these current drafts, please note the following:

1. Non-Pressure Treatment Scenarios: Based on the registrants' voluntary cancellation of the non-pressure treatment scenarios (FR Vol. 68 No. 73), the Agency has deleted these scenarios from the PRAs and Science Chapters;

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<sup>1</sup> These revised documents represent February, 2004, drafts.

2. Acid Copper Chromate (ACC): The Agency has also received a voluntary request for cancellation from the sole registrant of ACC (acid copper chromate). ACC contains no arsenic but does have approximately 50 percent more chromium (hexavalent) than formulations of CCA. There is one registration which is held by Osmose Chemical Company. Osmose has not sold this product for the last two years and prior to that time, its only use was on wood for cooling towers. Based on the receipt of this request, the Agency has not specifically assessed the risks associated with ACC in this RED. The Agency has however, received "me-too" applications from two applicants for ACC products. A decision has been made to not act on the Osmose voluntary cancellation until such time that a decision on the "me-too's" is made. The Agency has concerns about the increased amount of hexavalent chromium in ACC and has informed the "me-too" applicants that additional data/information are needed before the Agency can accurately assess the potential risks associated with this chemical's wood preservative use. Consequently, an assessment for ACC is not included in these February, 2004, documents, but will be addressed separately in the Agency's revised ACC risk assessment, should the Agency make the decision to grant these applications; and

3. The human PRA that is being forwarded concerns only occupational exposures/risks and does not address non-occupational scenarios (e.g., residential exposures/risks and specifically does not address children's exposures/risks, since these are being handled under a separate Agency probabilistic risk assessment).

In closing, in an effort to avoid duplication, RASSB has not developed an Executive Summary for these documents since the PRAs for human and environmental risks are presented in detail in their Science Chapters, which can be found under Attachments 10 and 12, respectively. The following Science Chapters are included as attachments to this memo:

### **Science Chapters<sup>2</sup>**

- Appendix 3: Case Overview
- Appendix 4: Product Chemistry
- Appendix 5: Residue Chemistry
- Appendix 6: Human Exposure
- Appendix 7: Review of Worker Exposure Study
- Appendix 8: Hazard Assessment
- Appendix 9: Epidemiology and Incidents

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<sup>2</sup> Note: These Appendices follow the listing presented in the FR Notice.

Appendix 10: Human Risk Characterization

Appendix 11 Environmental Fate

Appendix 12: Environmental Exposure/Modeling and Environmental Risk Characterization

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